

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION**

UNITED STATES OF AMERICA

v.

CATALIN PUSCASU

)
)
) **CASE NO.: 7:21-CR-24**
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)

AGREED STATEMENT OF FACTS

This Agreed Statement of Facts between the United States and the Defendant, Catalin Puscasu, briefly summarizes the facts and circumstances surrounding the criminal conduct at issue in this case. It does not contain all of the information obtained during the investigation and applicable to an accurate Presentence Investigation Report and Sentencing Guidelines Calculation. The Agreed Statement of Facts is not protected by proffer agreement or any other agreement and shall be wholly admissible at trial notwithstanding any rules or statutes to the contrary, including but not limited to, Federal Rules of Evidence 408 and 410 and Federal Rule of Criminal Procedure 11.

1. In May 2019, the United States Secret Service (USSS) Roanoke Resident Agency started an investigation into a foreign organization conducting ATM skimming. The investigation was prompted by reports from multiple local law enforcement agencies in Western District of Virginia that numerous victims filed complaints of unauthorized ATM withdrawals from their bank accounts.

2. Through this investigation it was discovered that between December 2018 and March 2019, Catalin Puscasu, Marius Catalui, and others known, and unknown to the United States, worked together to fraudulently obtain personal identifying information (PII), including debit/credit card numbers and corresponding PINs, from bank customers without lawful authority

and used that data to make unauthorized cash withdrawals from the accounts of these victims and/or use the victims' credit for their personal gain.

3. Specifically, Puscasu—who arrived in the United States no later than November 2018—and his associates utilized access device making equipment, commonly referred to as “skimming devices,” to facilitate this scheme. They installed these devices into the card readers on ATMs and in conjunction with small hidden cameras they affixed to the ATMs, they were able to capture victims' means of identification including bank account numbers and PINs. They then took this information, re-encoded it onto counterfeit or cloned cards, and then used these cards and stolen PINs to make unauthorized withdrawals from victim accounts. Several federally insured banks were impacted by these events.

During their investigation, law enforcement discovered that Puscasu and Catalui rented an apartment in Roanoke from November 24, 2018, through February 24, 2019. During this time, both were observed on surveillance footage law enforcement obtained from ATMs at Member One, Bank of the James, ValleyStar, and Fidelity Bank in connection with their investigation into skimming incidents that occurred at those banks. Specifically, Puscasu and/or Catalui were observed tampering with ATMs as they inserted the skimming devices. From additional bank video surveillance, they were later observed withdrawing funds from the accounts of customers who had used the compromised ATMs.

In sum, Puscasu and his co-conspirators obtained \$1,000 or more using unauthorized access devices. Their conducted affected interstate and foreign commerce and they knowingly possessed and used the means of identification of actual persons, without their permission. lawful authority (i.e., their permission).

SEEN AND AGREED:



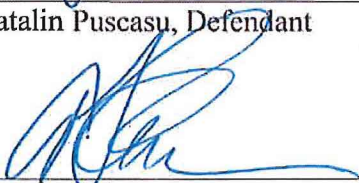
M. Coleman Adams
Assistant United State Attorney

I have reviewed the above Agreed Statement of Facts (2 pages) with my attorney, and I agree that it is true and accurate.

Date: 09 // 07 // 2022



Catalin Puscasu, Defendant



Anthony F. Anderson, Esq.
Counsel for Defendant